

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: DR. REDDY'S LABORATORIES LTD.
SECURITIES LITIGATION

Case No. 3:17-cv-06436-PGS-DEA

Class Action

**LEAD PLAINTIFF'S UNOPPOSED NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

KAPLAN FOX & KILSHEIMER LLP

Joel B. Strauss
850 Third Avenue
New York, New York 10022
Telephone: (212) 687-1980
Facsimile: (212) 687-7714
E-mail: jstrauss@kaplanfox.com

William J. Pinilis
160 Morris Street
Morristown, New Jersey 07960
Telephone: (973) 656-0222
Facsimile: (973) 401-1114
E-mail: wpinilis@kaplanfox.com

*Liaison Counsel for the Lead Plaintiff
and the Proposed Class*

[Additional Counsel Appear on Signature Page]

PLEASE TAKE NOTICE that Lead Plaintiff, the Public Employees' Retirement System of Mississippi, on behalf of itself and all other members of the proposed Settlement Class, through Court-approved counsel, hereby moves this Court for an Order, pursuant to Rule 23(a), (b)(3), and (e) of the Federal Rules of Civil Procedure: (i) preliminarily approving the proposed class action Settlement; (ii) preliminarily certifying the Settlement Class and appointing Lead Plaintiff as class representative, Labaton Sucharow LLP as Class Counsel, and Kaplan Fox & Kilsheimer LLP as Liaison Counsel, for purposes of the Settlement only; (iii) approving the form and content of the Notice of Pendency of Class Action, Proposed Class Action Settlement, and Motion for Attorneys' Fees and Expenses ("Notice"), Proof of Claim and Release, and the Summary Notice; (iv) finding that the procedures for distribution and publication of the Notice and Summary Notice constitute the best notice practicable under the circumstances and comply with due process, Rule 23, and the Private Securities Litigation Reform Act of 1995 ("PSLRA"); (v) setting a date and time for the Settlement Hearing, at which the Court will consider final approval of the Settlement, the Plan of Allocation, and Lead Counsel's application for attorneys' fees and expenses, including payment of costs and expenses to Lead Plaintiff pursuant to the PSLRA; (vi) appointing Epiq Class Action & Claims Solutions, Inc. as the claims administrator to administer the notice and claims process; and (vii) granting such other and further relief as the Court may deem fair and proper. Defendants do not oppose the relief requested in this motion.

This motion is based on the accompanying Memorandum of Law in Support of Lead Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement and the Declaration of Joel B. Strauss, dated May 15, 2020, with annexed exhibits, filed herewith.

A proposed Order Granting Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement, with

annexed exhibits, which was negotiated by the Parties to the Settlement, is also submitted herewith.

Dated: May 15, 2020

Respectfully submitted,

KAPLAN FOX & KILSHEIMER LLP

/s/ Joel B. Strauss
Joel B. Strauss
850 Third Avenue
New York, New York 10022
Telephone: (212) 687-1980
Facsimile: (212) 687-7714
E-mail: jstrauss@kaplanfox.com

William J. Pinilis
160 Morris Street
Morristown, New Jersey 07960
Telephone: (973) 656-0222
Facsimile: (973) 401-1114
E-mail: wpinilis@kaplanfox.com

*Liaison Counsel for the Lead Plaintiff
and the Proposed Class*

LABATON SUCHAROW LLP
James W. Johnson (Admitted *pro hac vice*)
Michael H. Rogers (Admitted *pro hac vice*)
John Esmay (Admitted *pro hac vice*)

140 Broadway
New York, New York 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477
E-mail: jjohnson@labaton.com
E-mail: mrogers@labaton.com
E-mail: jesmay@labaton.com

*Lead Counsel for Public Employees'
Retirement System of Mississippi and
Lead Counsel for the Proposed Class*

CERTIFICATE OF SERVICE

I certify that on May 15, 2020, I caused the electronic filing of the foregoing Lead Plaintiff's Unopposed Notice of Motion for Preliminary Approval of Class Action Settlement, using the Court's CM/ECF system, which will be sent electronically to the registered participants as identified on the attached Electronic Mail Notice List.

/s/ Joel B. Strauss

Joel B. Strauss